

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

| Plaintiffs' Executive Committee for Personal Injury and Death Claims | Plaintiffs' Executive Committee for Commercial Claims |
|---|---|
| Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP | Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR |
| Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC | J. Scott Tarbuton, <i>Liaison Counsel</i> COZEN O'CONNOR |

VIA ECF

September 9, 2020

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs' Executive Committees ("PECs") write, with the consent of the Kingdom of Saudi Arabia, to request a one-week extension to file any Motion for Reconsideration or Objections as to the Court's August 27, 2020 Opinion and Order (ECF No. 6408). Plaintiffs are awaiting responses from the Kingdom as to whether several witnesses discussed in the Court's Order will be produced for deposition, but the Kingdom has indicated it is not yet in a position to respond to those inquiries. The extension is needed to afford the parties an opportunity to complete their discussions on those outstanding issues, which may impact the necessity and scope of any Motion for Reconsideration or Objections as to the Order. In addition, several members of the PECs have significant commitments surrounding the upcoming anniversary of the September 11th attacks.

Honorable Sarah Netburn
September 9, 2020
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The parties thank Your Honor in advance for the Court's attention to this matter.

Respectfully submitted,

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*On behalf of the MDL 1570 Plaintiffs' Exec.
Committees*

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*On behalf of the MDL 1570 Plaintiffs' Exec.
Committees*

cc: The Honorable George B. Daniels (via ECF)
All MDL Counsel of Record (via ECF)

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*On behalf of the MDL 1570 Plaintiffs' Exec.
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